

Mary E. Bacon, Esq.
(NV Bar No. 12686)
SPENCER FANE LLP
300 S. Fourth Street, Suite 950
Las Vegas, NV 89101
Telephone: (702) 408-3400
Facsimile (702) 938-8648
Email: mbacon@spencerfane.com

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRITTANY WOODMAN, individually,

Plaintiff,

v.

MEDICREDIT, INC.

Defendant.

Case No. 2:22-cv-01210-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DEFENDANT’S TIME TO
RESPOND TO PLAINTIFF’S
COMPLAINT
(FIRST REQUEST)**

Medicredit, Inc. (“Medicredit” or “Defendant”), by and through its counsel of record, Spencer Fane LLP, and Brittany Woodman (“Plaintiff”), by and through her counsel of record, Prince Law Group, hereby stipulate and agree to extend the time for Defendant to file a response to Plaintiff’s Complaint from August 25, 2022 to September 8, 2022. This is the parties’ first request for an extension.

Defendant recognizes this extension is late. However, good cause and excusable neglect exist for this extension. Defendant was not aware of this litigation. Defendant’s outside counsel ran a docket report, and a diligent paralegal noticed this action. Defendant’s outside counsel immediately contacted Plaintiff’s counsel and explained the circumstances. Plaintiff’s counsel understood the circumstances and agreed to a brief extension.

After investigation of the circumstances, Defendant learned that the CT Corporation System transmitted notice of the action and a paralegal missed the notice in the electronic notification system due to a process error. Defendant is investigating to see if any procedures updates are warranted.

Further, after recognizing the process error, Plaintiff's and Defendant's counsel have been working together to determine if early resolution of this case is a possibility and Defendant is evaluating Plaintiff's settlement demand. Further, Plaintiff has agreed to the extension of time and no parties will be prejudiced by the brief extension. This extension allows the parties to focus their efforts on case resolution.

Dated this 2nd day of September, 2022.

Dated this 2nd day of September, 2022.

SPENCER FANE LLP

PRINCE LAW GROUP

/s/ Mary E. Bacon

Mary E. Bacon, Esq. (NV Bar No. 12686)
300 S. Fourth Street, Suite 950
Las Vegas, NV 89101
Attorneys for Defendant Medcredit, Inc.

/s/ Michael Yancey III

Michael Yancey III, Esq. (NV # 16158)
Price Law Group
8245 N. 85th Way
Scottsdale, AZ 85258
*Attorneys for Plaintiff
Brittany Woodman*

ORDER

IT IS SO ORDERED

DATED: 2:03 pm, September 06, 2022



**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**